



January 14, 2004

Filed Electronically Via ECFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Blackfoot Communications, Inc. f/k/a Montana Wireless, Inc. ("BCI") hereby submits its Interim Progress Report on implementation of E911 access over its digital wireless network, pursuant to the Commission's *Order to Stay in CC Docket No. 94-102*, released on July 26, 2002. In its June 30, 2003 Public Notice the Wireless Telecommunications Bureau provided further guidance on interim filings by small sized carriers. As requested in the Public Notice, a copy of this filing has been submitted via e-mail to E911compliancereports@fcc.gov, and by Fed Ex with the Wireless Telecommunications Bureau and the Enforcement Bureau.

Background

BCI is a wholly owned subsidiary of Blackfoot Telephone Cooperative, Inc. ("Blackfoot"), a rural telephone cooperative that provides local exchange telephone and other telecommunications services in the Missoula, Montana area. BCI is the licensee of station WPO1210 in the Broadband Personal Communications Service ("PCS"). Station WPO1210 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation ("GTE"), on June 23, 1995, for the Spokane-Billings Major Trading Area ("MTA"). On November 1, 1996, the Commission approved the application to partition to BCI a portion of GTE's License for the Spokane-Billings MTA, to include the Missoula and Kalispell Basic Trading Areas ("BTAs") and Powell County, from the Butte BTA. BCI utilizes Nortel's CDMA equipment for its PCS network.

BCI is committed to complying with Commission requirements regarding TTY, Enhanced 911 ("E911"), Automatic Location Identification ("ALI") and Communications Assistance for Law

Blackfoot Communications, Inc. f/k/a Montana Wireless, Inc.
E911 Implementation Progress Report – January 14, 2004

1 of 4

Enforcement Act ("CALEA"). However, in order to fully comply with these government mandates, BCI must upgrade its system. As the Commission is aware from BCI's TTY Quarterly Reports, due to Nortel's discontinuation of its support of BCI's current dual-load wireless and wireline traffic switch, purchased a second switch and must split the traffic from the existing switch. Before BCI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX9). Once the switch split is achieved, BCI must upgrade the system software a second time to MTX 10. Because of Nortel's decision to no longer support its dual mode switch, BCI has been put in the unusual situation of having to perform a technically complex switch split seamlessly. Nevertheless, BCI remains committed to doing so, as to comply with the Commission E911, TTY, ALI and CALEA mandates. BCI expects completion of that implementation and testing during first quarter 2004.

E911 Phase II Location Technology Implementation Progress

1. Type of Technology: As described in its November 9, 2000 Implementation Report, BCI intends to implement a handset-based solution utilizing Qualcomm's GPS One technology, in conjunction with GTE/Telecommunications Services, Inc.'s ("TSI's") PSAP solution. This technology will be used over BCI's entire network.
2. Testing and Verification: Thus far, BCI has not performed any testing. Testing is not possible until the switch split and software upgrades are complete. However, based on the initial tests, the manufacturers' of the product described above indicate that the performance will exceed Commission requirements. When the system is ready, BCI will begin testing by first segregating its service area into separate environments: urban, suburban, rural flatland, rural mountainous and areas served by repeaters. Test calls will be placed from various locations, including stationary locations, inside and outside of buildings, and mobile locations. Location information will be compared to handheld GPS readings. Testing will then be arranged with local PSAPs upon receipt of valid E911 requests. All testing will be in accordance with the Commission's *OET Bulletin No. 71*, or equivalent methods and procedures.
3. Implementation Details and Schedule: BCI will adhere to the implementation schedule outlined for Tier III handset-based providers in the *Order to Stay in CC Docket 94-102*. During first quarter 2001 BCI began selling and activating ALI-capable handsets. Today BCI offers seven different handsets, six of which are ALI-capable. The remaining handset is scheduled to be eliminated from the BCI available product line by the end of first quarter 2004.
4. PSAP Interface: To date there has not been a PSAP request for Wireless Phase I or Wireless Phase II E911. BCI will use the services of GTE/TSI, its current SS7 services provider. A data link will be established from BCI's serving Signal Control Point ("SCP") to the ALI database serving the local PSAPs, and between the SCP and a local server collecting the results of the location query. The voice portion will be forwarded to the selective router, as usual. The location will be sent to the ALI database along with the

number of the party initiating the E911 call. The PSAP will receive this information over existing data links.

5. Existing Handsets: BCI will continue to keep abreast of its current handset suppliers' location identification deployment plans. These suppliers currently include Kyocera, Motorola and Nokia.
6. Location of Non-Compatible Handsets: BCI will identify active non-compatible handsets during second quarter 2005. At that time BCI will encourage those customers with outdated technology to move to compatible models. If BCI finds that a substantial number of customers still have non-compatible equipment, it will consider a promotion to encourage customers to move to newer equipment. BCI will tout the new technology advantages and recommend that non-compatible handsets be restricted for use at campus locations, i.e., indoor locations in manufacturing plants and elsewhere where BCI will basically provide fixed service. BCI will use a "best practices" solution in connection with providing ALI to non-compatible handsets, assuming, of course, that the PSAP is equipped to utilize Phase II ALI data. However, BCI believes that most handsets will be compatible by December 31, 2005 because the average handset lasts two years or less and manufacture warranties expire after one year.
7. Other Information: While BCI has actively sold and activated ALI-capable handsets since first quarter 2001, it is important to note this service will not be operational until the switch split and upgrades are complete. BCI projects that those network changes and upgrades will be complete during first quarter 2004. BCI is on schedule to meet the ultimate implementation date of December 31, 2005. As of the present, BCI has not received any PSAP requests for either Phase I or Phase II deployment.

Respectfully submitted,

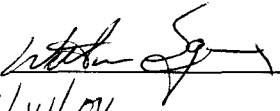


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CERTIFICATION

I certify that I am an officer of Blackfoot Communications, Inc. f/k/a Montana Wireless, Inc.; that I have examined the foregoing report and that to the best of my knowledge, information and belief, all statements of fact contained in this report are true and that said report is an accurate statement of the affairs of the above named respondent in respect to the data set forth herein as of January 13, 2004.

William Squires
Senior Vice President and General Counsel

Signature:  _____
Date: 1/14/04 _____

(Persons making willful false statements in the report form can be punished by fine or imprisonment under the Communications Act, 47 U.S.C. 220(e).)

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